

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	Chapter 11
)	
W. R. GRACE & CO., <i>et al.</i> ¹ ,)	Case No. 01-01139 (JKF)
)	Jointly Administered
Debtors.)	
)	Re: Docket No. 13406

**FINAL DESIGNATION OF ISSUES FOR FACT AND EXPERT
WITNESSES, DESIGNATIONS AND EXHIBITS RELATING TO
THE STATUTE OF LIMITATIONS AND PRODUCT IDENTIFICATION
ON BEHALF OF CERTAIN ASBESTOS PROPERTY DAMAGE CLAIMANTS**

Pursuant to the Court's October 13, 2006 Amended Scheduling Order Setting Various Deadlines Regarding Objections to Asbestos Property Damage Claims, Speights & Runyan ("S&R"), by and on behalf of Anderson Memorial Hospital ("Anderson") and the class of property damage claimants it seeks to represent, hereby designates the following fact and expert witnesses with respect to the issues of Product Identification and Limitations Periods, which includes those who are expected to testify live and those whose depositions will be read in lieu of live testimony.

¹ The Debtors consist of the following 62 entities: W. R. Grace & Co. (f/k/a Grace Specialty Chemicals, Inc.), W. R. Grace & Co.-Conn., A-I Bit & Tool Co., Inc., Alewife Boston Ltd., Alewife Land Corporation, Amicon, Inc., CB Biomedical, Inc. (f/k/a Circe Biomedical, Inc.), CCHP, Inc., Coalgrace, Inc., Coalgrace II, Inc., Creative Food 'N Fun Company, Darex Puerto Rico, Inc., Del Taco Restaurants, Inc., Dewey and Almy, LLC (f/k/a Dewey and Almy Company), Ecarg, Inc., Five Alewife Boston Ltd., G C Limited Partners I, Inc. (f/k/a Grace Cocoa Limited Partners I, Inc.), G C Management, Inc. (f/k/a Grace Cocoa Management, Inc.), GEC Management Corporation, GN Holdings, Inc., GPC Thomasville Corp, Gloucester New Communities Company, Inc., Grace A-B Inc., Grace A-B 11 Inc., Grace Chemical Company of Cuba, Grace Culinary Systems, Inc., Grace Drilling Company, Grace Energy Corporation, Grace Environmental, Inc., Grace Europe, Inc., Grace H-G Inc., Grace H-G II Inc., Grace Hotel Services Corporation, Grace International Holdings, Inc. (f/k/a Dearborn International Holdings, Inc.), Grace Offshore Company, Grace PAR Corporation, Grace Petroleum Libya Incorporated, Grace Tarpon Investors, Inc., Grace Ventures Corp., Grace Washington, Inc., W. R. Grace Capital Corporation, W. R. Grace Land Corporation, Gracoal, Inc., Gracoal II, Inc., Guanica-Caribe Land Development Corporation, Hanover Square Corporation, Homco International, Inc., Kootenai Development Company, L B Realty, Inc., Litigation Management, Inc. (f/k/a GHSC Holding, Inc., Grace JVH, Inc., Asbestos Management, Inc.), Monolith Enterprises, Incorporated, Monroe Street, Inc., MICA Holdings Corp. (f/k/a Nestor-BNA Holdings Corporation), MRA Intermedco, Inc. (f/k/a Nestor-BNA, Inc.), MRA Staffing Systems, Inc. (f/k/a British Nursing Association, Inc.), Remedium Group, Inc. (f/k/a Environmental Liability Management, Inc., E&C Liquidating Corp., Emerson & Curving, Inc.), Southern Oil, Resin & Fiberglass, Inc., Water Street Corporation, Axial Basin Ranch Company, CC Partners (f/k/a Cross Country Staffing), Hayden-Gulch West Coal Company, H-G Coal Company.

Fact Witnesses

1. Subject to its reservation of rights, Anderson identifies William Ewing or another representative of Compass Environmental, 1751 McCollum Parkway, NW, Kennesaw GA 30144-5908. Representatives of Compass Environmental, including Mr. Ewing's testimony will relate to inspections of buildings owned by Anderson Memorial Hospital, bulk and debris sampling performed, the chain of custody of those samples, and that those buildings contain asbestos materials manufactured by W. R. Grace & Co.

2. Subject to its reservation of rights, Anderson identifies Dr. Donald Pinchin or a representative of Pinchin Environmental, 5749 Coopers Avenue Mississauga, Ontario LAZ 1R9, who will testify regarding the identification of W. R. Grace product in Canadian buildings, as well as the inspection of certain buildings and the chain of custody of bulk samples taken.

3. Subject to its reservation of rights, Anderson identifies Dr. William Longo or another representative of Materials Analytical Services, 3945 Lakefield Court, Suwanee, GA 30024, who will testify regarding the analytical analysis of samples taken from buildings owned by Anderson and other claimants, the chain of custody of those samples, and that those buildings contain asbestos materials manufactured by W. R. Grace & Co.

4. Subject to its reservation of rights, Anderson may offer the deposition testimony of Kevin Fay taken in In re: Asbestos Schools Litigation on November 30, 1988. The subject matter and substance of Mr. Fay's testimony are fully set forth in the deposition transcript and exhibits attached thereto.

5. Subject to its reservation of rights, Anderson may offer the deposition testimony of John Welch taken in In re: Asbestos Schools Litigation on November 6, 17 and 18, 1988. The

subject matter and substance of Mr. Welch's testimony are fully set forth in the deposition transcript and exhibits attached thereto.

6. Subject to its reservation of rights, Anderson may offer the deposition testimony of Kenneth Millian taken in County of Jasper/Blue Cross Blue Shield of SC v. W. R. Grace & Co. on February 21 and October 26, 1990. The subject matter and substance of Mr. Millian's testimony are fully set forth in the deposition transcript and exhibits attached thereto.

7. Subject to its reservation of rights, Anderson may offer the deposition testimony of Edlu Thom taken in County of Jasper v. W. R. Grace & Co. on February 22, 1990. The subject matter and substance of Mr. Thom's testimony are fully set forth in the deposition transcript and exhibits attached thereto.

8. Subject to its reservation of rights, Anderson may offer the deposition testimony of Carolyn Tieger taken in In re: Asbestos Schools Litigation on November 29, 1988. The subject matter and substance of Mr. Welch's testimony are fully set forth in the deposition transcript and exhibits attached thereto.

9. Claimants may also offer the testimony by deposition of the following persons who, at the time of the deposition were or had been Grace employees, designers who specified Grace products or applicators who applied Grace products in buildings, relating to Grace's manufacture, marketing and application of its Monokote products:

Robert Beder
Connecticut Mutual vs. W.R. Grace
May 22, 1995

Harold D. Bishop
State Farm Mutual Auto Insurance vs. W.R. Grace
May 13, 1992

Elijah David Bossier
Security Homestead Association vs. W.R. Grace
June 15, 1989

Glen Carpenter
Jeannine Galbreath, et al. vs. U.S. Gypsum Co., et al.
September 21, 1997

Richard Connor
Cheshire Medical Center vs. W.R. Grace
July 10, 1990

Creighton Crowe
The First Savings Banks vs. W. R. Grace
September 3, 1992

Hal Garrett
Liberty Life Insurance Company vs. W.R. Grace
June 2, 1989

Ross Lee
Los Angeles Unified School District vs. W. R. Grace
February 21, 1992

P.J. Lyons
State Farm Mutual Automobile vs. W.R. Grace
May 19, 1992

Robert H. Ritterbush
Montana-Dakota Utilities Company vs. W. R. Grace
December 13, 1990

Samuel Lee Templeton
Greenville County School District vs. US Gypsum Company, et. al.
January 4, 1984

10. Subject to its reservation of rights, to the extent that the Debtors dispute the authenticity of admissibility of their own documents and records, Anderson reserves the right to call or designate the deposition testimony of Grace representatives regarding the source, content and authenticity of Grace's own records.

Designation of Issues by Expert Witnesses

1. Subject to its reservation of rights, William M. Ewing, CIH, Compass Environmental, Inc., 1751 McCollum Parkway, NW, Kennesaw GA 30144-5908 . Mr. Ewing is a Certified Industrial Hygienist. His testimony will relate to the field of asbestos identification, product identification and he may testify regarding his expertise and experience with state and federal regulations as they relate to the identification, control and removal of asbestos-containing materials.

2. Subject to its reservation of rights, Dr. William E. Longo, PhD., Materials Analytical Services, Inc., 3945 Lakefield Court, Suwannee, GA 30024. His testimony will relate to the identification of products manufactured by W. R. Grace & Co. through the use of scientific constituent analysis techniques.

3. Subject to its reservation of rights, Dr. Donald Pinchin, Pinchin Environmental, 5749 Coopers Avenue Mississauga, Ontario LAZ 1R9. His testimony will relate to his opinions regarding the identification of products manufactured by W. R. Grace & Co. and may further testify regarding his training and experience with respect to the various Provincial asbestos regulations that apply to the identification, control and removal of asbestos-containing materials in the various Canadian Provinces.

Deposition Designations

Claimants expect to offer the deposition designations in the attached list. Exhibit A.

Exhibits

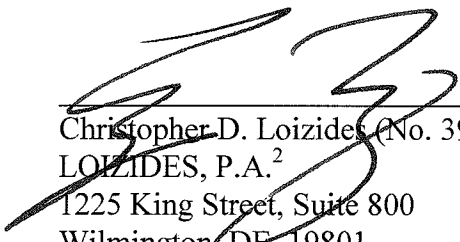
Claimants expect to offer the exhibits in the attached list. Exhibit B

Reservation of Rights

Anderson and the claimants it represents reserve the right to supplement or amend its witness lists, witness disclosures, deposition designations, expert reports or other disclosures as new or

additional information may become available, or as may be permitted by the applicable rules of procedure or the Court. Specifically, Anderson notes that the Statute of Limitations is an affirmative defense which the Debtors bear the burden of proving. Therefore, Anderson specifically reserves its rights to amend, supplement or add additional witnesses in response to the evidence or witnesses disclosed by the Debtors. Additionally, Anderson and the claimants it represents further reserve the right to name or present new or additional fact or expert witnesses in rebuttal of any fact or expert witness identified by the Debtors.

DATED: March 13, 2007



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SUMMARY OF EXHIBITS

EXHIBIT A: Deposition designations

EXHIBIT B: List of exhibits